

REMARKS/ARGUMENTS

Favorable reconsideration of this application as presently amended and in light of the following discussion is respectfully requested. Claims 1-27 and 29-34 are pending, Claims 1-21, 26 and 29 having been amended and Claim 28 having been canceled by way of the present amendment.

In the outstanding Office Action the specification was objected to; Claim 26 was rejected under 35 U.S.C. § 112, second paragraph; Claims 1- 7, 9-11 and 14-34 were rejected as being unpatentable over Kohonen et al. (article entitled "Self Organization of a Massive Document Collection") in view of Derthick (article entitled "Interfaces for Palmtop Image Search"); Claim 8 was rejected as being unpatentable over Kohonen et al. in view of Derthick and in further view of Doerre et al. (U.S. Patent No. 6,446,061); and Claims 12-13 were rejected as being unpatentable over Kohonen et al. in view of Derthick and in further view of Bruijn et al. (article entitled "Patterns of Eye Gaze during Rapid Serial Visual Presentation").

In reply, the specification has been amended as requested.

Furthermore, Applicants acknowledge and appreciate the Examiner's consideration of the references submitted in the IDS of 11/24/2003, as well as the IDS of 03/04/2004.

Claim 26 has been amended consistent with 35 U.S.C. § 112, second paragraph. However, if the Examiner disagrees, the Examiner is invited to telephone the undersigned so that mutually agreeable claim language may be identified.

Claim 1 has been amended to define a video processing apparatus. The video processing apparatus has a memory configured to store a set of distinct information items. The apparatus also includes an information retrieval system that has a user control configured to define a search criterion for selecting information items. The system also includes a detector configured to detect those positions within the array of nodes corresponding to the selected information items. A graphical user interface is also included to display points

which are points within a display area on a user display, and also sequentially displays in time representations of the selected information items.

Amended Claim 1 includes a detector that detects positions within the array of nodes corresponding to the selected information items. Support for this feature is found for example in Figure 7, showing the assembly of information items at specific positions (e.g., position 290). Moreover, it is respectfully submitted that neither Figures 5 nor 6 of Kohonen et al. describes the detection of positions within the array of nodes. Rather, Kohonen et al. merely describes which node has a large number of relevant subsections.

It should also be recognized that Claim 1 has been amended to be directed to a video processing system, unlike Kohonen et al. Moreover, Kohonen et al. is directed towards document collection that do not include dynamic parts, and consequently would not have a need for the sequential display of representations of the items.

The outstanding Office Action recognizes that Kohonen et al. does not disclose the graphical user interface that also displays in a sequence in time a plurality of representations of the selected information items. Applicants agree with this. Moreover, an advantage with the invention defined by Claim 1 is that by embodying the information retrieval system within a video processing apparatus, the system can provide a non-linear referencing mechanism for stored video footage by way of storing characterized footage metadata and random access storage. Therefore, for example, the user query could be to play back (or newly record) some footage, and request the time stamps/links to similar footage already recorded or archived (see e.g. Figure 11 and the corresponding discussion in the specification (e.g. page 15, lines 12-20)). The system then provides the results for the user to select.

Kohonen et al. neither teaches nor suggests such features related to a video processing apparatus, nor would it be capable of doing the same, as it is based on the self-organization of documents (e.g. 6,840,568 patent Abstract (see e.g. Kohonen et al., Abstract)).

Regarding the claimed graphical user interface, the Office Action attempts to cure the deficiencies of Kohonen et al. by asserting Derthick. Assuming *arguendo* that Derthick does disclose such a graphical user interface as claimed, it is respectfully submitted that one of ordinary skill in the art would not reasonably believe that the graphical user interface in Derthick could be combined with the self-organization in Kohonen et al. to arrive at the presently claimed invention. The Office Action asserts that the alleged motivation for making the combination would be to provide a method for having an efficient multiple image retrieval based on RSVP premises as noted by Derthick. Applicants respectfully traverse this assertion as it is readily recognized by those of ordinary skill in the industry that it is not a straightforward endeavor to make such a combination, as noted in column 2 on the first page of De Bruijn, "The design of RSVP application is not straightforward". Therefore the combination of RSVP on SOM is not something that is taught or suggested in the references themselves, nor would one of ordinary skill in the art have recognized the possibility for making such a combination. Furthermore, the alleged motivation in the Office Action does not take into consideration the video component as presently claimed. Moreover, a video processing apparatus, using the presently claimed invention, would have the advantage of considering the dynamic aspects associated with video. Kohonen et al. is simply not directed to such an application and therefore would not have the need, nor the motivation, to be modified to incorporate a sequence in "time" of a plurality of representation of the selected information items. Moreover, documents are static, unlike video which is dynamic.

Consequently, it is respectfully submitted that amended Claim 1 patentably defines over Kohonen et al. in view of Derthick. Although of differing statutory class and/or scope, it is respectfully submitted that Claims 2-7, 9-11, 14-27 and 29-34 as amended also, patentably define over Kohonen et al. in view of Derthick for at least the same lack of motivation reasons discussed above with regard to Claim 1.

Likewise, Claims 8 and 12-13 are rejected over tertiary references (Doerre and Bruijn) based on the initial assertion of Kohonen et al. and Derthick. However, it is respectfully submitted that Doerre and Bruijn do not cure the deficiencies discussed above with regard to Claim 1 (as compared with Kohonen et al. and Derthick), and therefore Claims 8 and 12-13 also patentably define over the asserted prior art.

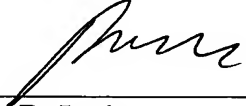
Consequently, in view of the present amendment and in light of the foregoing comments, it is respectfully submitted that the invention defined by Claims 1-27 and 29-34, as amended, is definite and patentably distinguishing over the prior art. The present application is therefore believed to be in condition for formal allowance and an early and favorable reconsideration of this application is therefore requested.

Respectfully submitted,

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